

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Technologies, Inc., et al., No. 3:23-cv-06708

Case No. 3:23-md-03084-CRB
**DECLARATION OF DANIEL
CUMMINGS IN SUPPORT OF
DEFENDANTS' AMENDED
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6 – 17th Floor

1 I, Daniel Cummings, declare:

2 1. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for
 3 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Uber"). I am
 4 a member in good standing of the Bars of the States of Missouri, Kansas, and Nebraska. I know the
 5 following facts to be true of my own knowledge, except those matters stated to be based on information
 6 and belief, and if called to testify, I could competently do so. I offer this Declaration in the above-
 7 captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA,
 8 LLC's Amended Administrative Motion to Consider Whether Another Party's Materials Should Be
 9 Filed Under Seal.

10 Because the materials at issue were designated confidential by Plaintiffs, or Plaintiffs have
 11 otherwise requested that they be maintained under seal, Defendants filed the following under seal:

12 Document	13 Description	14 Designating Party
15 Defendants' Motion for 16 Partial Summary Judgment (Jaylynn Dean case)	17 Motion containing name of third- party witness, S.M.	18 Sealed at Plaintiffs' request
19 Declaration of Johnathan 20 Schneller in Support of Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)	21 Declaration containing name of third-party witness, S.M.	22 Sealed at Plaintiffs' request
23 Exhibit 6 to Defendants' 24 Motion for Partial Summary Judgment (Jaylynn Dean case)	25 Excerpt of expert report of Bruce Weiner dated September 26, 2025, marked as Confidential.	26 Plaintiffs
27 Exhibit 8 to Defendants' 28 Motion for Partial Summary Judgment (Jaylynn Dean case)	29 Excerpt of transcript of June 27, 2025 deposition of Plaintiff Jaylynn Dean.	30 Sealed at Plaintiffs' request
31 Exhibit 9 to Defendants' 32 Motion for Partial Summary Judgment (Jaylynn Dean case)	33 Excerpt of transcript of July 22, 2025 deposition of third-party witness S.M., marked as Highly Confidential – Attorneys' Eyes Only.	34 Plaintiffs

1	Document	Description	Designating Party
2	Exhibit 10 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)	Tempe Police Department records Bates stamped as JDean-TempePD-000001-25 and marked as Confidential – Attorney Eyes Only	Plaintiffs
5	Exhibit 20 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)	Excerpt of expert report of Veronique Valliere dated September 26, 2025, marked as Confidential	Plaintiffs
7	Exhibit 21 to Defendants' Motion for Partial Summary Judgment (Jaylynn Dean case)	Excerpt of Appendix D of expert report of Lacey R. Keller dated September 26, 2025, marked as Confidential	Plaintiffs

10 2. I declare under penalty of perjury under the laws of the United States of America that
 11 the foregoing is true and correct.

12 Executed this 13th day of November, 2025.

13 /s/ Daniel Cummings
 14 **Daniel Cummings**